

COMMONWEALTH OF KENTUCKY  
BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION  
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF TELESTO	)	
ENERGY PROJECT LLC FOR CERTIFICATE OF	)	
CONSTRUCTION FOR AN APPROXIMATELY 110	)	CASE NO.
MEGAWATT MERCHANT ELECTRIC SOLAR	)	2022-00096
GENERATING FACILITY IN HARDIN COUNTY,	)	
KENTUCKY	)	

SITING BOARD STAFF'S FIRST REQUEST FOR INFORMATION  
TO TELESTO ENERGY PROJECT LLC

Telesto Energy Project LL (Telesto), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on August 29, 2022. The Siting Board directs Telesto to the Kentucky Public Service Commission's July 22, 2021, Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Telesto shall make timely amendment to any prior response if Telesto obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Telesto fails or refuses to furnish all or part of the requested information, Telesto shall provide a written explanation of the specific grounds for its failure to respond completely and precisely.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Telesto shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Various places in the application and exhibits list different acreages for the project. Provide the total leased acreage for the project, the total fenced acreage, and the total acreage that will contain project components.

2. Refer to the Application, paragraph 12, page 4. Also refer to the Application, paragraph 20(a), page 6. These paragraphs list different megawatts for the project. Provide the correct total megawatts for the project.

3. Provide a schedule for the project, starting from the receipt of the proposed certificate for construction to the completion of the project, and including the length of each construction phase.

4. Provide the number of miles between the Telesto Project and the Rhudes Creek Solar, LLC Project (Rhudes Creek Solar), Case No. 2021-00127, *Electronic Application of Rhudes Creek Solar, LLC for a Certificate of Construction for an Approximately 100-Megawatt Merchant Electric Solar Generating Facility and Related 138 KV Nonregulated Electric Transmission Line Approximately 1 ½ Miles in Length in Hardin County, Kentucky Pursuant to KRS 278.700 and 807 KAR 5:100.*

5. Provide the number of miles between the Telesto Project and the Stonefield Solar, LLC Project (Stonefield Solar), Case No. 2022-00011, *Electronic Application of Stonefield Solar, LLC for a Certificate of Construction for an Approximately 120-Megawatt Merchant Electric Solar Generating Facility and Nonregulated Electric Transmission Line in Hardin County, Kentucky Pursuant to KRS 278.700 and 807 KAR 5:100.*

6. Explain any overlaps in the projected construction schedules of the three projects.

7. Describe the potential for cumulative effects on noise from construction activities of the three projects, and any steps to minimize these effects.

8. Describe the potential for cumulative effects on traffic and roadways from construction activities of the three projects, and any steps planned to minimize these effects.

9. Describe the potential for cumulative effects on property values and land uses from the construction and operation of the three projects.

10. Describe what steps have been taken, or will be taken, to communicate with the developers of Rhudes Creek Solar and Stonefield Solar.

11. Verify if a power purchase agreement has been made. If so, provide.

12. Refer to the Application, Exhibit B, Addresses for Pre-Application Notices, and Addresses for Public Information Meeting Notice. Provide a map identifying the adjacent parcels labelled by the Assessor's Parcel Number (APN).

13. Refer to the Application, Exhibit A, page 5, titled "Public Resources within Two Miles of PV Panels." Provide a map with the 2-mile buffer from the boundaries of the leased parcels, not from the boundary of the solar panels.

14. Provide the stormwater management plan for construction and operation.

15. Explain planned mitigation measures for eliminating any glint or glare that could affect Addington Field. Also provide any permits or communications with the Federal Aviation Association or the Kentucky Airport Zoning Commission.

16. If batteries are to be used for energy storage, provide the location of the batteries on the site.

17. Provide information about existing or proposed utilities that will be necessary for construction or operation of the project.

18. Refer to the Site Assessment Report (SAR), page 3, paragraph 7. Telesto proposes to build a 9,000-foot, 138 kV non-regulated transmission line. Explain why Telesto has not submitted an application for a non-regulated transmission line.

19. Submit a map with the complete route of the gen-tie line connecting the project substation to the Central Hardin 138 kV substation owned and operated by East Kentucky Power Cooperative (EKPC). Include the parcels with the APN and owner name

that the transmission line will cross. Also include the anticipated length of the gen-tie within and outside of the project boundaries.

20. Provide any easements that have been secured or need to be secured for the gen-tie outside of the project boundaries.

21. Refer to the SAR, page 3, paragraph 6. Provide an explanation of why portions of the alternating current collection system will be above and below ground. Provide information regarding the overhead portions.

22. Refer to the SAR, page 3, paragraph 7. Describe the need for the Project's oil containment area. Also describe the size and design of the oil containment area.

23. Refer to the SAR, page 5, paragraph 13. Detail the planned safety requirements for access and egress during construction and operation. Include the design of perimeter safety fence for the substation. Also include access for emergency services if required.

24. Explain the proposed setbacks for the project. Include the distance between solar equipment and adjacent residences.

25. Refer to the SAR, page 6, paragraph 15(b). Describe any communication between Telesto and the P&L Railway (P&L) regarding the proposed Project. Provide any P&L requirements for the railroad crossing.

26. Provide any geotechnical studies that have been completed.

27. Provide a map of any karst features within the project boundaries and within the 2-mile radius. Also provide any mitigation measures proposed for karst features during construction.

28. The Cecilia Gas Storage Field that is owned by the city of Elizabethtown, is near the project boundaries. Detail any conversations with the city of Elizabethtown or the Energy and Environment Cabinet's Division of Oil and Gas regarding whether there are any limitations to boring or pile driving within the Project due to the proximity of the gas storage field.

29. The Mid-Valley Pipeline Company has a 22" pipeline carrying liquid crude oil within the project boundaries. The access road to the project substation will cross the pipeline. Provide any communication with Mid-Valley Pipeline Company about construction of the access road.

30. Detail the status of any applications for zoning changes or conditional use permits that are required for the project.

31. Detail the status of any litigation in state or federal court, or before an administrative agency other than the Siting Board involving this project.

32. Refer to the Application, Exhibit M, page 4. Explain how the economic impact analysis would differ if the analysis for Hardin County was conducted using county level data as opposed to state level data scaled down to Hardin.

33. Refer to the Application, Exhibit M, pages 4-5. The model indicates approximately 335.9 construction phase jobs, and .08 operation phase jobs will be created in the state. The model indicates approximately 8.4 construction phase jobs, and zero operation phase jobs will be created in Hardin County.

a. Confirm that the estimated economic impacts for the project are based upon accurate inputs.

b. If the inputs are accurate, explain why there will only 8.4 jobs will be created in Hardin County.

c. Confirm that Telesto intends to hire from within Hardin County to the extent possible.

d. Provide the JEDI model results for Hardin County only.

34. Explain whether Telesto intends to pursue an Industrial Revenue Bond (IRB) and a Payment In Lieu Of Taxes (PILOT) Agreement with Hardin County. If yes, explain if the IRB and PILOT Agreement will change the government revenue impact.

35. Refer to Exhibit H, Appendix A, pages 16-17. Provide the distances from the source of sound to each noise receptor within 1,000 feet using the receptor IDs in Appendix A.

a. Distance from each receptor to its nearest inverter.

b. Distance from each receptor to its nearest solar panel.

c. Distance from each receptor to the substation.

36. Refer to Exhibit H, page 14. Update the map to include labels for receptor IDs found in Exhibit H, Appendix A.

37. Refer to section D.31 on page 12 of the SAR. State the distance (e.g., 50 feet) at which the noise levels for the transformer and central inverters were measured, according to manufacturer specifications.

38. Refer to the SAR, page 13, paragraph 32. Provide a description of the tracking motor operation for both the monofacial and bifacial modules. Include how frequently the motor engages per hour and how the tracking motor operation changes throughout the day as the panels follow the sun.

39. Refer to the SAR, page 14, paragraph 36. Also refer to Exhibit H, page 4. Provide the distance at which pile driving noise levels of 110 to 117 dBA were estimated.

40. Refer to the Application, Exhibit H, page 5. Provide the distance from the sound and the noise receptor for the measurement of 30dBA for the normal conversation and 60 dBA for household appliances.

41. Refer to the Application, Exhibit H, Figure 1.

a. Confirm the 55 dBA/1,000 ft contour is calculated from the nearest pile-driving locations.

b. Provide an updated Figure 1 that identifies which noise receptors are non-participating and a 63 dBA/1,000 ft contour boundary.

42. Refer to the SAR, page 17. Also refer to the Application, Exhibit H. Neither notes any proposed noise mitigation during construction. Explain why Telesto believes noise mitigation for construction is not necessary. If Telesto does anticipate noise mitigation, explain what methods will be used.

43. Refer to the Application, Exhibit H, page 5. The sound study stated there are no state or local sound regulations for solar facilities. Explain if any other sound regulations were considered, including regulations for construction noise generally.

44. Refer to the Application, Exhibit H, page 6. Explain the basis for the sound power levels used in the Computer Aided Noise Abatement (CadnaA) modeling.

45. Refer to the SAR, pages 15, paragraphs 39-40. Also refer to SAR, Exhibit I, Traffic Impact Study.



a. Provide an estimate of the number and approximate weight classes of the heavy and light duty trucks anticipated on site per day during the construction phase.

b. Provide the estimated weight of the project's required substation transformer and the truck class necessary for its delivery.

c. Provide estimates of anticipated peaks times in equipment deliveries, traffic to the site, and number of workers on site across the duration of the construction phase.

46. Describe any discussions that Telesto has held with the Kentucky Transportation Cabinet and the Hardin County Road Department regarding the projects impact on roadways.

47. Submit a copy of the leases or purchase agreements, including options, separate agreements, or deeds which Telesto has entered into in connection with the proposed solar facility, including the agreements for each of the parcels of the Project.

48. Detail any contracts by which Teletso has paid, has negotiated to pay, or any compensation paid to non-participating landowners, whether cash or otherwise, near the project. Include the terms of the agreements and which properties are involved in terms of distance to the project boundaries.

Nancy Vinsel for

Linda C. Bridwell, PE

Executive Director

Public Service Commission *on behalf*  
of the Kentucky State Board on

Generation and Transmission Siting

P.O. Box 615

Frankfort, KY 40602

DATED     AUG 08 2022    

cc: Parties of Record

Case No. 2022-00096

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